

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

WESTERNGECO L.L.C.,

Plaintiff,

v.

ION GEOPHYSICAL CORPORATION, ET AL.,

Defendants.

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)
) Civil Action No. 4:09-cv-1827
)
) Judge Keith P. Ellison
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**JOINT MOTION TO VACATE PERMANENT INJUNCTION
AND TO DISMISS WITH PREJUDICE**

WHEREAS Plaintiff WesternGeco LLC and Defendant ION Geophysical Corporation (collectively, “the Parties”) have entered into a Settlement Agreement; and

WHEREAS a condition of the Settlement Agreement requires that the Parties move the Court to vacate the permanent injunction entered against ION on June 19, 2013 (D.I. 634; *see also* D.I. 687, D.I. 770);

Accordingly, Plaintiff WesternGeco LLC and Defendant ION Geophysical Corporation hereby jointly move the Court pursuant to Federal Rules of Civil Procedure 60(b) to vacate the permanent injunction (D.I. 634, D.I. 687, D.I. 770). WesternGeco and ION also jointly move pursuant to Rule 41(a) to dismiss this action **with** prejudice, including, but not limited to, all claims and counterclaims asserted therein, each party agreeing to bear its own fees and costs.

Dated: April 13, 2020

Respectfully submitted,

/s/ Lee L. Kaplan

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/s/ Collin J. Cox

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document has been served on all counsel of record via the Court's ECF system on April 13, 2020.

/s/ Collin J. Cox

Collin J. Cox